

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Themistocles Tsarnas, being first duly sworn, hereby depose and state as follows:

AGENT BACKGROUND

1. I am an investigative or law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7); that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, the offenses enumerated in 18 U.S.C. § 2516. I have been trained in advanced investigative techniques and have satisfied all requirements defined by the Federal Criminal Investigator Classification series established by the U.S. Office of Personnel Management.

2. I have been employed by the Federal Bureau of Investigation (hereinafter "FBI") as a Special Agent since May of 2018 and have been assigned to the Cleveland Division, Youngstown Resident Agency, since February 2019. I have been assigned to and participated in investigations in the area of general criminal matters, which include bank robberies, drug violations, crimes against children, and threats of violence. I have participated in all of the usual methods of investigation including, but not limited to, financial analysis, physical surveillance, cooperating witnesses, confidential human sources, telephone toll record analysis, interception of wire and cellular telephone communications, consensual monitoring, and the execution of search and arrest warrants.

3. Over the course of my employment as a FBI Special Agent I have conducted and participated in multiple criminal investigations that have resulted in arrests for violent criminal offenses. These crimes resulted in subsequent convictions in Federal Courts.

4. This affidavit is being submitted for the limited purpose of establishing probable cause to believe that **JUSTIN OLSEN**, age 18, currently residing at XXX Oakridge Drive, Boardman, Ohio 44512 in the Northern District of Ohio, Eastern Division, has committed a

violation of Title 18, United States Code, Section 115(B), Threatening to Assault a Federal law enforcement officer.

5. The statements contained in this affidavit are based in part on: information provided by FBI Special Agents, Task Force Officers and FBI Analysts, written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents, information gathered from the results of physical surveillance conducted by law enforcement agents, reporting by eye witnesses, independent investigation and analysis by FBI agents/analysts and computer forensic professionals, and my experience, training and background as a Special Agent of the FBI. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish the necessary foundation for the requested complaint.

6. This court has jurisdiction to issue the proposed warrant because it is a “court of competent jurisdiction” as defined in 18 U.S.C. § 2711. Specifically, the Court is a district court of the United States that has jurisdiction over the offense being investigated.

#### BASIS FOR PROBABLE CAUSE

7. iFunny<sup>1</sup> is a website and mobile application featuring user-submitted media in the form of images, and videos. iFunny is known for circulating and popularizing a variety of internet memes<sup>2</sup>.

8. On or about February 11, 2019, FBI Agents from Anchorage, Alaska (hereinafter “FBI Anchorage”) researched the Internet chat room iFunny and the associated user,

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<sup>1</sup> iFunny was created on April 26th, 2011, as an iOS mobile application on the Apple “App Store” for sharing photos, videos.

<sup>2</sup> A meme is humorous image, video, piece of text, etc., that is copied (often with slight variations) and spread via the Internet.

“ArmyOfChrist” with an associated Internet web address of, <https://ifunny.co/user/ArmyOfChrist>. The investigation into ArmyOfChrist was based upon the observation by FBI Anchorage into multiple Internet postings in which ArmyOfChrist discussed supporting mass shootings, and assault and/or targeting of Planned Parenthood.

9. On or about March 18, 2019, FBI Anchorage noted the iFunny account related to ArmyofChrist “showed a large increase in subscribers” from the previous month. FBI Anchorage noted the Subscriber amount reached approximately 4,400.

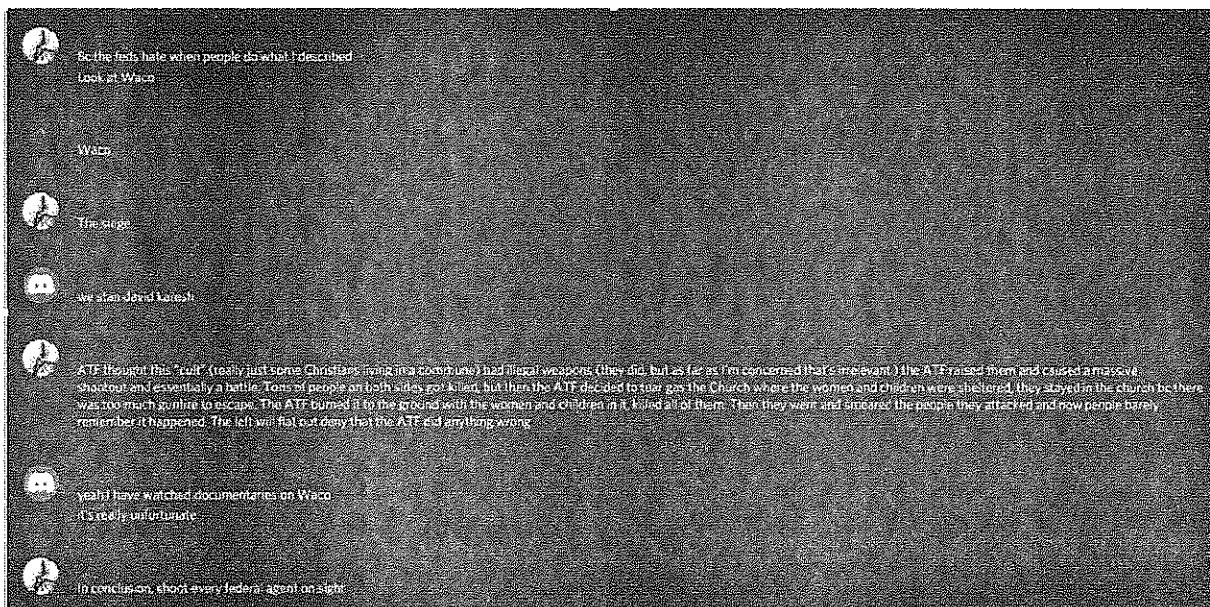
10. On or about March 28, 2019, FBI Anchorage issued a subpoena to iFunny for subscriber information for the user, ArmyOfChrist.

11. On or about April 16, 2019, FBI Anchorage received the subpoena return for iFunny user ArmyOfChrist, which has an associated email address of, [thearmyofchristiscoming@gmail.com](mailto:thearmyofchristiscoming@gmail.com).

12. On or about June 2, 2019, ArmyOfChrist engaged in a conversation with another user regarding the 1993 siege in Waco, Texas<sup>3</sup>. During that conversation, ArmyOfChrist posted a threat to assault federal law enforcement officers, “In conclusion, shoot every federal agent on sight.” Below is a screenshot captured depicting iFunny online comments made by ArmyOfChrist; the posting reflects ArmyOfChrist’s opinion of the 1993 Waco siege:

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<sup>3</sup> The Waco siege was the siege of a compound belonging to the religious sect Branch Davidians, carried out by American federal and Texas state law enforcement, as well as the U.S. military, during the performance of their official duties, between February 28 and April 19, 1993.



13. On or about July 8, 2019, FBI Anchorage served a subpoena to Google for subscriber information for Gmail account, thearmyofchristiscoming@gmail.com. The Google subpoena return indicated an account registered to **JUSTIN OLSEN** (hereafter "**OLSEN**") with an Internet Protocol (IP) address of 24.101.90.107. A query of IP address 24.101.90.107 was associated with Armstrong Cable Services located in Boardman, Ohio.

14. On or about August 2, 2019, FBI Anchorage reassigned this matter to FBI Youngstown, Ohio for further investigation.

15. On or about August 6, 2019, I reviewed past online posts made by ArmyOfChrist documented and witnessed that ArmyOfChrist stated, "...don't comply with gun laws, stock up on stuff they could ban. In fact, go out of your way to break these laws, they're fucking stupid," and "Hell, even the Oklahoma City bombing shows that armed resistance is a viable method of political change. There is no legal solution" and "In conclusion, shoot every federal agent on sight."

16. On or about August 6, 2019, TFO William "Bill" Woods of the FBI Mahoning Valley Violent Crimes Task Force (MVVCTF) conducted an Ohio Law Enforcement Gateway (OHLeg) query of **OLSEN** which indicated a residence of, XXX Presidential Court, Boardman, Ohio, and that the owner of XXX Presidential Court, Boardman, Ohio is **OLSEN**'s mother.

17. On or about August 6, 2019, Boardman Municipal Court Judge, Joseph M. Houser authorized the search of XXX Presidential Court, Boardman, Ohio and the seizure of any computers, cellular devices, hate related literature, and firearms.

18. On or about August 7, 2019, FBI SAs and TFOs with the MVVCTF executed a search warrant at XXX Presidential Court, Boardman, Ohio. During the execution of the warrant, **OLSEN** was not present, however neighbors indicated that **OLSEN** recently moved to his father's residence at XXX Oakridge Drive, Boardman, Ohio.

19. On or about August 7, 2019, FBI SAs and TFOs with the MVVCTF went to Olsen's father's residence. MVVCTF investigators observed **OLSEN** exiting the residence and arrested **OLSEN** for state charges.

20. On or about August 7, 2019, I went to XXX Oakridge Drive, Boardman, Ohio to interview **OLSEN**. I advised **OLSEN** of his Miranda rights and he verbally stated that he understood his constitutional rights and wished to speak with me.

21. During the interview with **OLSEN**, he admitted to me that he posted on iFunny from the username ArmyofChrist and he made the comments online concerning violence but stated that they were "only a joke." **OLSEN** also admitted to making the comments on the Internet regarding shooting Federal Agents on sight, and stated "...that's a hyperbolic conclusion based on the results of the Waco siege." and "...where the ATF slaughtered families." **OLSEN** said that he resided at XXX Oakridge Drive, Boardman, Ohio for approximately two weeks. **OLSEN** also told me that he utilized his personal Apple iPhone 7 to make the referenced posts online.

22. On or about August 7, 2019, **OLSEN** gave me written consent to search his bedroom at XXX Oakridge Drive, Boardman, Ohio and his car which he used daily. MVVCTF investigators located a large machete inside of the trunk **OLSEN**'s car.

23. On or about August 7, 2019, MVVCTF Investigators entered **OLSEN**'s residence at XXX Oakridge Drive, Boardman, Ohio, upon entering the residence, Officers observed approximately 300 rounds of various ammunition to include rifle ammunition on the stairway leading to the second floor. Given the nature of the threat, the potential for firearms in the house and the potential of suspects unknown being inside of the residence, officers conducted a safety sweep of the residence. Inside **OLSEN**'s room, investigators observed a computer on **OLSEN**'s bed and an iPad on the dresser. In another bedroom, investigators observed rifle cases, approximately 10,000 rounds of ammunition, camouflage clothing, and camouflaged backpacks. Investigators also observed a large gun vault during the search.

24. On or about August 7, 2019, Eric Olsen accompanied TFO John Elberty (MVVCTF) and FBI SA Bryon Speakes into his bedroom at XXX Oakridge Drive, Boardman, Ohio. Eric Olsen opened the gun vault revealing several firearms to include AR-15 style rifles



and shotguns.

25. On or about August 7, 2019, Judge Houser authorized the search of XXX Oakridge Drive, Boardman, Ohio. The search warrant authorized the seizure of any computers, cellular devices, hate related literature, and all firearms.

26. The search of XXX Oakridge Drive, Boardman, Ohio resulted in the seizure of approximately 15 rifles to include assault type rifles, shotguns, as well as approximately 10 semi-automatic pistols. MVVCTF investigators also observed an estimated 10,000 rounds of ammunition and additional firearm paraphernalia which was left within the residence.

#### CONCLUSION


27. Based on the foregoing, there is probable cause to believe that **OLSEN** has committed a violation of Title 18, United States Code, Section 115(B), Threatening to Assault a Federal law enforcement officer.

28. Accordingly, I respectfully request the court issue a warrant for the arrest of **JUSTIN OLSEN**.

A handwritten signature in blue ink, appearing to read 'TS' with a stylized flourish.

SA Themistocles Tsarnas  
Federal Bureau of Investigation

Sworn to and subscribed before me this 12 day of August 2019.

A handwritten signature in black ink, appearing to read 'George J. Limbert'.

HONORABLE GEORGE J. LIMBERT  
U.S. MAGISTRATE JUDGE